

Carnation Wastewater Treatment Facility DEIS

July 26, 2004

King County Agriculture Program comments:

- L1-1** | The DEIS does not indicate that both the proposed River Discharge and Wetland Discharge sites are within the Snoqualmie River Valley Agricultural Production District (APD), a designated resource area containing agricultural lands of long-term commercial significance. The following comments are intended to ensure that there is minimal impact to agriculture if either site is selected as the discharge site.

Conveyance Pipeline:

- L1-2** | Pipeline location: Portions of the pipeline that will be located on private property should be sited so that there is minimal impact to farming operations. For example, from an agricultural perspective it is usually preferable to locate pipeline easements along property boundaries rather than across the middle of a property. Another acceptable alternative is to locate the pipeline under an existing field road so that its installation does not disturb agricultural soils or take any additional property out of agricultural production.

- L1-3** | Pipeline installation: Burying the pipeline at a depth ranging from 3 – 8 feet is acceptable to the Agriculture Program as this depth is sufficient to allow it to be farmed over. We recommend a minimal depth of at least 3 feet as a shallowly buried pipeline could interfere with tillage operations.

Wetland Discharge:

- L1-4** | Portions of this proposed discharge site have recently been used for agriculture and because it is within the designated APD, the County has an obligation to maintain suitability for agricultural use on as much of the property as possible. The Agriculture Program concurs with the DEIS in that the areas having the lowest elevation should be selected as the discharge areas where wetlands will be created and/or enhanced. The DEIS states that because of soil composition, little contact is anticipated between the ground water and the surface and subsurface water in the wetland discharge site. However, we are concerned about lateral movement of the discharged water and the possibility that it may cause the water table in adjoining farmable areas to rise and result in their becoming too wet to farm. To reduce the likelihood of this occurring, we recommend that the design for this discharge site include sufficient excavation or other design feature, so that when discharge occurs, the elevation of the water in the newly created/enhanced wetlands is no greater than the current elevation of the water table.

Thank you for the opportunity to comment on the DEIS.

Local Governments

King County Agriculture Program (L1)

Response to Comment L1-1

The text has been revised in Chapter 9 sections 9.1.3.1 and 9.1.3.2 to indicate the river and wetland discharge sites are located within the Snoqualmie River Valley Agricultural Production District.

Response to Comment L1-2

King County Wastewater Treatment Division recognizes the Agriculture Program concerns regarding impacts to farming operations. The Wastewater Treatment Division seeks to utilize established right-of-ways and easements to the greatest extent possible. Locating wastewater facilities in the right-of-way would likely avoid impacts to farming operations. Please also see the response to the next comment (L1-3). If installation of a pipe in agricultural soils or currently farmed land is necessary the planned depth of installation should be sufficient to farm over.

Response to Comment L1-3

The project plans currently propose burying the pipeline to a depth of 3 to 8 feet. Please see the response to Comment L1-2 on other steps that will be taken to avoid disturbance to tillage operations.

Response to Comment L1-4

The wetland discharge alternative includes plans for the installation of swales to direct high water to existing streams or oxbow lakes. It is anticipated these swales will prevent the lateral movement of discharged water to areas where it could readily infiltrate to ground water. Other groundwater lateral movement is not expected because of the interaction between the ground water and surface water will be quite small even for water that is moved laterally off the discharge site due to the low permeability of the surface geology as discussed in Section 6.1.4.

A03P0173 - Carnation Wastewater Treatment Facility

Draft Environmental Impact Statement Floodplain Review Comments from DDES

L2-1

- If this Wastewater Treatment Facility was built it appears that undeveloped properties currently in the Carnation area would have homes built on them. Therefore it appears that potentially more people and their property will be located in the regulatory 100 year Floodplain than are currently. This is a major health and safety issue. The basis for Federal, State and King County Flood Hazard Codes is to limit development in the regulatory 100 year Floodplain. What method is proposed to eliminate or minimize adding people and property in the regulatory 100 year Floodplain?

L2-2

- Both of the proposed sites of the Wastewater Treatment Facility have been located on the current Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM). This FEMA FIRM (panel 53033C0418 G) was published on December 6, 2001. It appears that a majority of the proposed Weckwerth property (tax parcel # 2125079035) is located in an area that is determined to be outside of the regulatory 100 year Floodplain. The site currently owned by the City of Carnation (tax parcel # 1625079073) is located completely within the regulatory 100 year Floodplain. Therefore it appears that the best location of the Wastewater Treatment Facility would be on the Weckwerth property.

L2-3

- Removal of excess excavation and other material including construction materials should be removed from the regulatory 100 year Floodplain.
- During the flood season (September 30 to May 1) construction materials and all temporary structures and/or substances hazardous to public health, safety and welfare shall be removed from the regulatory 100 year Floodplain.
- The proposed "River Discharge Site" is located in King County's jurisdiction and within the FEMA Floodway and King County's Zero-rise Floodway. The proposed construction of outfall and installation of the conveyance piping will be required to meet the requirements of King County's Flood Hazard Code. The installation of this conveyance piping shall not change the existing topography in the regulatory 100 year Floodplain.
- The proposed "Wetland Discharge Area" is located in King County's jurisdiction and within King County's Zero-rise Floodway. The installation of the conveyance piping, proposed outfall and any proposed structures, etc. will be required to meet the requirements of King County's Flood Hazard Code.

King County Department of Development and Environmental Services (L2)

Response to Comment L2-1

Several Chapters of the Carnation Municipal Code (CMC) regulate land use in the 100-year flood plain including Chapter 15.88 – Environmentally Sensitive Areas Chapter 15.64 Floodways, Floodplains, and Erosion. The City of Carnation Shoreline Master Program also regulates development in the Floodplain. These regulatory tools would be used to manage development within the regulatory 100-year Floodplain.

Response to Comment L2-2

As was disclosed in the Draft EIS, a portion of each Wastewater Treatment Plant site is within the 100-year floodplain. The decision makers, the King County Executive in coordination with the Carnation City Council, will consider the impacts disclosed in the Draft and Final EIS when selecting a site for the treatment plant. Please see the response to comment Washington State Department of Natural Resources, S2-2 for further discussion of alternative selection. The final decision on where the facility will be located will be made through the consideration of policy criteria and environmental factors. Any portion of the wastewater treatment facility located in the 100-year floodplain would be designed to meet applicable federal, state, and local flood proofing and development standards.

Response to Comment L2-3

The King County Wastewater Treatment Division will work with the King County Department of Development and Environmental Services and the City of Carnation to make sure proposed facilities in King County's jurisdiction meet applicable regulatory requirements.



King County
Office of Business Relations and Economic Development
Historic Preservation Program
King County Courthouse, Room E-402
516 Third Avenue [MS: KCC-EX- 0402]
Seattle, WA 98104-5002

July 23, 2004

TO: Wesley Sprague, Environmental Planner, Wastewater Treatment Division

FR: Charlie Sundberg, Preservation Planner

RE: Carnation Wastewater Treatment Facility Draft Environmental Impact Statement

The following comments pertain to Chapter 13 (Cultural Resources) of the DEIS. Overall the chapter is an appropriate and adequate assessment of cultural resource issues raised by the proposed project. There are a few minor errors of fact that should be corrected and one issue that seems to be incompletely addressed.

L3-1

On page 13-2 in the first paragraph it is not clear that the City of Carnation has a landmarks ordinance and that the King County Historic Preservation Program provides services to the City through an interlocal services agreement signed in 1994. King County has no jurisdiction within the city boundaries. The City landmarks ordinance is codified in CMC 15.96.

L3-2

As a result of this jurisdictional issue, the "Listing Status" column of Table 13-1 on page 13-4 should be corrected to note that the Entwistle House, IOOF Hall and Commercial Hotel are City of Carnation landmarks, not King County landmarks. On the other hand, the Hjertoos Farm is a King County landmark, and the Stossel Bridge has been found eligible for the National Register, listings not identified in the table. The Dairy Farm Properties MPD should be eliminated from the table because it is a form of contextual history, not a property.

L3-3

The issue that is insufficiently discussed is the City's wastewater collection system, which is entirely contingent upon construction of the treatment system. This is mentioned only in passing in the introduction on page 1-1. The adverse effects of construction of the collector system will occur whenever it is built, not just if construction occurs at the same time as construction of the treatment system, as suggested on page 13-16. Because of proximity to the Tolt-Snoqualmie confluence, known sites and ethnographic information, much of the city is considered to have high potential for archaeological resources. Construction of the collector system has "a potential" (p. 13-16) and is highly likely to adversely affect unrecorded archaeological resources and could directly affect historic buildings as well. Many historic buildings in Carnation occupy small lots, particularly those along Tolt Avenue, and have been unable to expand due to septic system limitations. Thus construction of the complete sewerage project "could" (page 13-16)

L3-4

King County Historic Preservation Program (L3)

Response to Comment L3-1

Chapter 13, Section 13.1.1 has been revised to provide clarification on the regulatory authority over cultural resources in the project area.

Response to Comment L3-2

Table 13-1 has been revised as recommended.

Response to Comment L3-3

The City of Carnation will conduct a National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) review of the sanitary sewer collection system project. As part of these reviews the city will work with a professional consultant to assess the proposed action. For further information please contact the City of Carnation at (425) 333-4192.

Response to Comment L3-4

The King County Wastewater Treatment Division agrees that potential for indirect impacts to historic buildings could increase as a result of development following the treatment plant.

Carnation Wastewater Treatment Facility DEIS
July 23, 2004
Page 2

L3-4 | and is highly likely to have adverse indirect effects due to greatly increased development pressure.

L3-5 | The DEIS should reiterate in Chapter 13 that the City will conduct what amounts to a second phase of the complete wastewater treatment system and that the adverse impacts of collector system construction will be addressed in subsequent SEPA documents. As with the current project, the collector system's direct impacts on unrecorded archaeological resources can be mitigated through archaeological surveying, monitoring if necessary, and data recovery. Direct and indirect/cumulative impacts to historic buildings can be mitigated through measures such as physical monitoring and protection, designation of eligible properties as City landmarks, design review and related measures.

L3-6 |

Thank you for the opportunity to review and comment on this proposal. Please contact me if you have any questions about these comments.

Response to Comment L3-5

This section has been modified as requested. Please see the response to L3-3 for further information on the NEPA and SEPA environmental review of the sanitary sewer collection system.

Response to Comment L3-6

Please see the response to L3-3 for further information on the SEPA review of the sanitary sewer collection system.



CITY OF CARNATION

August 9, 2004

Don Theiler, Division Director
Department of Natural Resources and Parks
Wastewater Treatment Division
King Street Center, KSC-NR-0505
201 South Jackson Street
Seattle, WA 98104

Dear Mr. Theiler:

It has been a pleasure to work with the staff from the Wastewater Treatment Division on this very important project. The staff continues to provide excellent support and continually work towards providing sewer service to the City of Carnation. I am writing this letter on behalf of the City of Carnation City Council to provide comments on the Carnation Wastewater Treatment Facility Draft Environmental Impact Statement (EIS) prepared in compliance with the State Environmental Policy Act (SEPA) (RCW 43.21C) the SEPA Rules (WAC 197-11), and Chapter 20.44 King County Code, Implementing SEPA in King County procedures for Carnation Wastewater Treatment Facility.

The City of Carnation strongly agrees with the purpose of and need for the project stated in Chapter 1 of the EIS. Without this project the City will continue to rely on on-site wastewater treatment and disposal systems. Because many of these systems are old and/or not designed to properly treat wastewater, they pose a growing threat to public health and the environment. Furthermore, the small sizes of many lots in the City make it extremely difficult for proposed development and redevelopment on these lots to meet health department regulations for on-site wastewater disposal. This limits the City's ability to implement its adopted comprehensive land use plan consistent with the Growth Management Act. It has also resulted in the loss of businesses. Existing businesses have been forced to close in some cases and locating new business is often impossible. The loss of business is eroding the City's tax base, impairing the City's ability to provide essential services. This could ultimately threaten the economic viability of the City. For these reasons we feel strongly that the proposed wastewater treatment facility is essential to Carnation's future.

Overall we find that the Draft EIS does a good job of evaluating the potential environmental impacts of the proposed project. Following are our comments on specific sections.

Chapter 1, p. 1-5 1.3 Benefits and Disadvantages of Reserving for Some Future Time the Implementation of the Proposal.

We request to have the second paragraph to read, beginning with the words move ahead to "move ahead because of the "public health hazard" and because any situation hazardous to human health is also a threat, and sometimes even more of a hazard to environmental health. In this case, with Carnation's proximity to vital salmonid habitat that includes prime Chinook spawning areas, to not go ahead is unconscionable."

L4-1

4621 TOLT AVENUE • P. O. BOX 1238 • CARNATION, WA • 98014-1238
PHONE: (425) 333-4192 • FAX: (425) 333-4336
WWW.CI.CARNATION.WA.US

City of Carnation (L4)

Response to Comment L4-1

Thank you for your comment. The text of this section has been changed to reflect this information

- 2 -

August 9, 2004

Chapter 1, p 1-7 1.5.1 Treatment Plant Site Alternatives.

The City Council would like a reference that the city-owned site has a potential of two access routes to it as opposed to the Weckwerth site only having a single access and current truck use to that access.

L4-2

Chapter 3, p 3-5 Site Location and Characteristics.

The City Council would like to see a reference that the City-Owned site currently has limited number of neighbors and the Tolt Middle School's student population proximity to the Weckwerth site.

L4-3

Chapter 3 p. 3-10 & 11 3.1.4 No Action Alternative.

We would like to request language be added to this section to express the following:

If a treatment facility is not built, Carnation is left to a precarious and uncertain future. Businesses will continue to leave and new businesses will find it even more difficult if not impossible to locate here. The businesses that are able to stay or start up will most likely be those that do not provide the core tax base a city needs to provide services and remain financially viable.

L4-4

Chapter 4, p 4-16 4.2.5 No action alternative.

We would like to request the following language be incorporated into this section that integrates the following:

"...ground water contamination occurrence would continue and increase, not only less treatment than provided by a treatment plant, but in many cases, no treatment, and just direct discharge into the ground water."

L4-5

Chapter 6, p 6-32 6.2.5 No Action Alternative.

Added language the City Council would like to see in this section is the following:

No only will the approximate 50% of old systems continue to fail, many of the newer systems also could fail, due to improper use and/or failing drain fields or lack of reserve areas. Also, most of these newer systems do not fall under the Seattle/King County Health Department's current on-site septic requirements which increase their susceptibility for ground water contamination.

L4-6

Chapter 11 p 11-12 11.2.5 No Action Alternative.

The City Council requests that the following be added to the first sentence:

"..Also could lead to decrease in use of school sports facilities, if drain field reserves or new drain field construction would require use of those areas."

L4-7

Chapter 15 p 15-10 15.2.4 No Action Alternative.

The City Council would like to see the following reflected in the first sentence:

"...public services currently find it difficult, if not impossible to add on to their facilities. This would continue, as would the difficulties and impossibilities for new services to locate in Carnation and existing services remain."

L4-8

Response to Comment L4-2

Chapter 14, Sections 14.1.2.1 and 14.1.2.2 have been changed to reflect this information.

Response to Comment L4-3

Chapter 3, Section 3.1.1.3: has been changed to indicate the proximity of the school to the Weckwerth site.

Through reviewing aerial photographs and site visits it has been determined that the City-owned site has more neighbors, including an apartment building, than the Weckwerth site. King County Wastewater Treatment Division agrees that the student population of Tolt Middle School would result in a large number of individuals in closer proximity to the treatment plant should the Weckwerth site be selected.

Response to Comment L4-4

The potential land use impacts of no action are discussed in Chapter 9, Section 9.2.4. SEPA does not require evaluation of economic issues.

Response to Comment L4-5

The language has been incorporated into the text.

Response to Comment L4-6

This text has been added to this section.

Response to Comment L4-7

This text has been added to this section.

Response to Comment L4-8

This text has been added to this section.

- 3 -

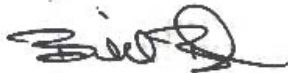
August 9, 2004

The City Council is also supportive of the concerns expressed by the Riverview School District. The safety and health of our children are paramount in our desires that this project be a benefit to all citizens and businesses in the City of Carnation.

L4-9

We look forward to your continued support on this very important project.

Sincerely,



Bill Brandon
City Manager

CC City Council
Roth Hill Engineering
Phil Olbrechts, City Attorney
PCS Group

Response to Comment L4-9

Please see the responses to the comments from the Riverview School District.